

# Exhibit 1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
BLAKE LIVELY,

Plaintiff,

v.

WAYFARER STUDIOS LLC, JUSTIN BALDONI,  
JAMEY HEATH, STEVE SAROWITZ, IT ENDS  
WITH US MOVIE LLC, MELISSA NATHAN, THE  
AGENCY GROUP PR LLC, and JENNIFER ABEL,

Defendants.  
----- X

JENNIFER ABEL,

Third-Party Plaintiff,

v.

JONESWORKS LLC,

Third-Party Defendant.  
----- X

WAYFARER STUDIOS LLC,  
JUSTIN BALDONI, JAMEY HEATH, IT ENDS WITH  
US MOVIE LLC, MELISSA NATHAN, JENNIFER  
ABEL, and STEVE SAROWITZ,

Plaintiffs,

v.

BLAKE LIVELY, RYAN REYNOLDS, LESLIE  
SLOANE, VISION PR, INC., and THE NEW YORK  
TIMES COMPANY,

Defendants.  
----- X

Civ. Action No. 1:24-cv-10049-LJL  
(Consolidated for pretrial purposes  
with 1:25-cv-00449-LJL)  
rel. 1:25-cv-00449-LJL

**AFFIDAVIT OF BRYAN J.  
FREEDMAN**

**AFFIDAVIT OF BRYAN J. FREEDMAN**

I, Bryan J. Freedman, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a partner of Liner Freedman Taitelman + Cooley, LLP, attorneys for Consolidated Plaintiffs Wayfarer Studios LLC (“Wayfarer”), Justin Baldoni (“Baldoni”), Jamey Heath (“Heath”), It Ends With Us Movie LLC (“IEWU”), Melissa Nathan (“Nathan”), Jennifer Abel (“Abel”), and Steve Sarowitz (“Sarowitz”) (collectively, the “Wayfarer Parties”) in the above-captioned matter.

2. I submit this affidavit in opposition to the motion to strike filed on May 14, 2025 by Blake Lively (Dkt. 217) regarding my May 14, 2025 letter (Dkt. 218) elaborating on the basis for the Wayfarer Parties’ subpoena to Venable LLP.

3. On February 14, 2025, I received a voicemail from a person very closely linked to Taylor Swift, whom I subsequently called back the same day. Out of respect for the individual in question, I am not identifying them at this time; however, should the Court direct me to do so, I will comply with the Court’s order.

4. During the February 14<sup>th</sup> phone call, which lasted approximately one hour, the speaker told me that they had been informed that J. Douglas Baldrige, counsel for Taylor Swift and a partner at Venable LLP, had received a phone call from Michael Gottlieb, counsel for Blake Lively and Ryan Reynolds during which Mr. Gottlieb requested, on Ms. Lively’s behalf, that Taylor Swift make a social media statement in support of Ms. Lively given her absence from the Super Bowl that year, and stated that if Ms. Swift failed to do so, Ms. Lively would release “ten years” of private texts with Ms. Swift. The individual also told me that they had been informed that Mr. Baldrige had accused Mr. Gottlieb of extortion and ended the call.

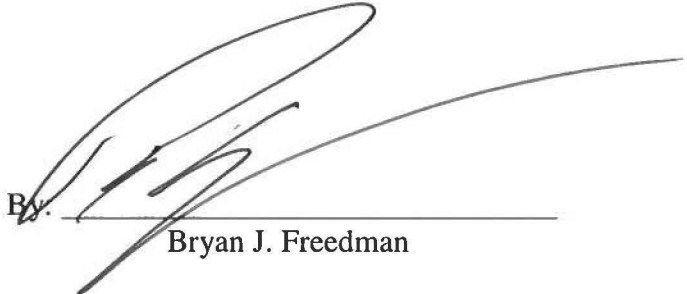
5. During the same February 14<sup>th</sup> call, the individual told me that they had been informed that, four or five months earlier, Ms. Lively had requested that Ms. Swift delete her text messages with Ms. Lively.

6. I was connected to this individual through a mutual friend who informed me that the individual wanted to talk. We have had several phone calls since February 14<sup>th</sup>.

7. On a later call with the same individual, the individual told me that Mr. Baldridge had sent a written communication to Mr. Gottlieb relating to their phone conversation. My office issued a subpoena to Venable LLP for the purpose of seeking the aforementioned written communication.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Dated: Los Angeles, CA  
May 15, 2025

  
By: \_\_\_\_\_  
Bryan J. Freedman

### ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of LOS ANGELES)

On MAY 15, 2025 before me, CHRISTINA PARKER, NOTARY PUBLIC  
(insert name and title of the officer)

personally appeared BRYAN FREEDMAN,  
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are  
subscribed to the within instrument and acknowledged to me that he/she/they executed the same in  
his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the  
person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the  
foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature [Signature] (Seal)

